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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

MAIL BRANCH

Ms. Donna Searcy, Secretary Federal Communications Commission 1919 M Street NW Room 222 Washington DG 20554

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Dear Ms. Searcy:

RE: PR DOCKET NO. 92-235 OPPOSITION TO DOCKET

As an end user of public safety and/or special emergency frequencies I would like to voice my opposition to "spectrum refarming" as outlined in notice of proposed rule making #92-235. While public safety interests are unique from other spectrum users due to the public safety considerations, this distinction is not addressed in this proposal. Some major points of concern are listed below.

The possibility of having to replace existing equipment and expand the number of transmitter sites puts a tremendous fiscal burden on the governmental entities. These agencies cannot expect to bear this extra financial burden in this time of budget cutbacks.

Power limitations based on height above average terrain and fifty mile separations are not practical in public safety applications where a specific geopolitical area must be covered.

There is no provision for mutual aid and inter agency operations. Such operations form the backbone of emergency communications

There is also no provision for eliminating potential interference from existing Canadian stations.

The time table for implementation of narrow channel spacing will not be effective unless all stations change system standards simultaneously. This, in reality, is impossible. There are also many questions pertaining to frequency